

2. **Fact Witnesses Who May Be Called.** The following individuals may have personal knowledge of the issues involved in this case:

- a. Walter Krantz
312 Watson Road
Taylors, South Carolina 29687
864.430.3335

The Plaintiff will testify concerning ladder, the facts of his fall, and the seriousness of his injuries.

Witnesses b through g will testify concerning facts of the Plaintiff's fall, condition and actions of the ladder, and the seriousness of the Plaintiff's injuries.

- b. Harper Krantz
111 Clarendon Street
Clemson, South Carolina
803.767.8692
- c. Reo Hoots, Jr.
1006 Turning Leaf Circle
Boiling Springs, South Carolina 29316
864.270.9181
- d. Mr. and Mrs. Jeff Bomer
326 N. Valley View Drive
Taylors, South Carolina 29687
- e. Randy Phillips
324 N. Valley View Drive
Taylors, South Carolina 29687

3. **Expert Witnesses Likely to Be Offered.**

- a. John S. Morse, PE
Post Office Box 370
Westville, OK 74965

John Morse will testify as an expert concerning the defective condition and unreasonably dangerous nature of the ladder being used by the Plaintiff at the time of his injury.

The following physicians (b through f) will testify concerning the Plaintiff's injuries

and treatment:

- b. Benjamin Shay Koch, MD
Greenville Memorial Physician
701 Grove Road
Greenville, South Carolina 29605
- c. Dr. Matthew L. Hummell
Dr. Kyle J. Jeray
Dr. Timothy McHenry
Dr. David R. Goetz
Univ. Medical Group Orthopaedics
Greenville, South Carolina
- d. *Dr. Coleman D. Fowble*
Dr. David Redmond
Midlands Orthopaedics
Columbia, South Carolina
- e. Dr. David Lee
Carolina Orthopaedics & Sports Medicine
Columbia, South Carolina
- f. Dr. Steadman Hawkins
Spartanburg, South Carolina
- g. The Plaintiff will retain the services of a life care planner and an economist to testify concerning the Plaintiff's past and future economic needs.

4. Summary of Claims.

The Plaintiff has filed three separate causes of action: 1) Negligence; 2) Strict Liability; and 3) Breach of Warranty.

5. The parties received directions from the Court.

A proposed revised scheduling Order has been submitted.

6. Limitations on Discovery:

Plaintiff does not at this time know of any special circumstances which would affect the time frames of discovery in this matter.

Respectfully submitted,

s/Douglas F. Patrick

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s/John D. Kassel

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Greenville, South Carolina